REMARKS

By this Response, no claims have been amended, added or canceled. Claims 1-3, 5, 18, 22-25, 27, 40, and 44-49 are pending.

Rejection of Claims 1, 23 and 45 Under 35 U.S.C. § 112, Second Paragraph

In the Office Action, the Examiner rejected claims 1, 23, and 45 under 35 U.S.C. § 112, second paragraph as failing to particularly point out and distinctly claim the invention. Applicants respectfully traverse this rejection.

The Examiner continues to identify the phrase "wherein the development environment is separated from the production environment" as not being understood. More specifically, the Examiner states that because claimed invention is computer data management system to manipulate content data by computer program function, the production environment and development environment can be interpreted as computer program functions, but are not clearly understood.

In response to the Examiner's comments, it is respectfully submitted that this language has been used consistently throughout the specification and prosecution and will be understood by one of ordinary skill in the art as distinct data processing events for manipulation of data by the program(s). Oftentimes, there are simultaneous processes running and applicants have used the term "environment" to capture the concept of processing distinct but parallel events. It is submitted that Applicants are entitled to be his own lexicographer in this regard. One example of support for Applicants' selected recitation is found on page 9, lines 17-21 of the specification which reads:

"Figure 3 depicts an example of the content management environment of the invention. The content management environment 301 as shown in a preferred embodiment is separated from the production environment 302. This advantageous approach maintains focus on changing content within the content management environment 301 while avoiding unnecessary change in the production environment 302 and associated application 121.

The content management environment 301 contains components required for the pre-production activities involved in building the production data store 350."

Accordingly, reconsideration and withdrawal of the objection under 35 U.S.C. § 112, second paragraph, is requested in view of the above.

Rejection Under 35 U.S.C. § 103(a)

In the Office Action, the Examiner rejected claims 1-3, 5, 18, 22-25, 27, 40, and 44-49 under 35 U.S.C. § 103(a) as being unpatentable over *Tucker et al.* (U.S. Publication Number 2004/0049598) in view of *Peck et al.* (U.S. Publication Number 2002/0188936). Applicants respectfully traverse this rejection.

Claim 1 is directed to a method for editing content of a production data store comprising, *inter alia*, replicating the production data store from a production environment to produce a core data store in a development environment and "generating a user view, for presentation to a user, from [a] modified shadow data store and [a] core data store, by combining content of said modified shadow data store with content of said core data store to produce a temporary image defining content available for propagation from [a] development environment to [a] production environment."

The references, *Tucker et al.* and *Peck et al.*, fail to disclose, teach or suggest, individually or in combination, replicating the production data store from a production environment to produce a core data store in a development environment and generating a user view, by combining content of the modified shadow data store with content of the

core data store to produce a temporary image defining content available for propagation from the development environment to the production environment.

Tucker et al. suggests a content distribution system that utilizes caches. Tucker et al. fails to disclose, teach or suggest the replication of the production data store into a core data store in a development environment. Moreover, the Examiner specifically recognizes that Tucker et al. fail to teach, "generating a user view, by combining content of the modified shadow data store with content of the core data store", which is displaying combined data to the user. Accordingly, Peck et al. is introduced as supplying these deficiencies.

Peck et al. fails to rectify the deficiency of Tucker et al. More particularly, it is respectfully submitted that Peck et al. is directed to a content distribution system. Although the Examiner refers to "page 8 and claim 3" of Peck et al., a careful review of this reference fails to teach or suggest the claimed limitation of replicating the production data store from a production environment to produce a core data store in a development environment and "generating a user view, by combining content of the modified shadow data store with content of the core data store". Referring specifically to Peck et al. page 8, the only modification or "editing" of the content in the cache is to modify the HTTP header 1320 and pass the decompressed data back to the browser. See page 8, paragraph [0065], lines 8-9 and 17-18 of Peck et al. Thus, there is no creation of a core data store. The other mention of editing in Peck et al. is found on page 9, paragraph [0075], lines 2-7 thereof. Even in this passage, the content distribution system may edit web pages, replace the content tags with embedded or object tags, and/or modify the existing tags and compress the content. The editing is

performed automatically with no interaction with the web or server. With regard to claim 3, as specifically identified by the Examiner, the "edit" is of the content directly in the cache. Thus, there cannot possibly be the claimed feature of generating a user view, for presentation to a user, from said modified shadow data store and said core data store, by combining content of said modified shadow data store with content of said core data store to produce a temporary image defining content available for propagation from the development environment to the production environment

Since *Tucker et al.* and *Peck et al.* fail to teach or suggest at least replicating the production data store from a production environment to produce a core data store in a development environment and "generating a user view, for presentation to a user, from said modified shadow data store and said core data store, by combining content of said modified shadow data store with content of said core data store to produce a temporary image defining content available for propagation from the development environment to the production environment", the combination also fails to teach or disclose all the features recited in claim 1. Claims 2, 3, 5, 18 and 22 depend from claim 1, and thus, are also patentable over *Tucker et al.* and *Peck et al.* for at least the same reasons described above as well as for their additional recitations.

Further, claim 23 is directed to a data processing system for editing content of a production data store comprising, *inter alia*, "generating means for generating a user view for presentation to a user, from [a] modified shadow data store and [a] core data store, by combining content of said modified shadow data store with content of said core data store to produce a temporary image defining content available for propagation from [a] development environment to [a] production environment."

Claim 45 is directed to an article for editing content of a production data store comprising, *inter alia*, "code means in the medium for generating a user view for presentation to a user, from [a] modified shadow data store and [a] core data store, by combining content of said modified shadow data store with content of said core data store to produce a temporary image defining content available for propagation from [a] development environment to [a] production environment."

Once again, *Peck et al.* fail to provide the missing teachings of *Tucker et al.* as identified by the Examiner. Specifically, *Peck et al.* fail to teach or suggest the replicating of an image prior to modifying the image. Accordingly, the limitation of the present invention in which there is a "core data store in the development environment" is absent and therefore does not overcome the deficiency of *Tucker et al.*

Accordingly, all claims should be considered patentable, and the rejection under 35 U.S.C. § 103(a) should be withdrawn.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request reconsideration and reexamination of this application and the timely allowance of the pending claims.

Please grant any extensions of time required to enter this response and charge any additional required fees to our deposit account 09-0460.

Respectfully submitted,

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